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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

Joey Salmon,

Plaintiff,

v.

Experian Information Solutions, Inc.
 and HSBC Bank USA, NA,

Defendants.

Case No.: 2:22-cv-01550-CDS-EJY

**Joint unopposed motion to extend
 deadline to file the proposed
 discovery plan and scheduling order
 (First request)**

Joey Salmon (“Plaintiff”) and HSBC Bank USA, NA (“Defendant”) (jointly as the “parties”), by and through their respective counsel, hereby file this joint unopposed motion to extend Local Rule 26-1’s deadlines for the parties to hold their initial Fed. R. Civ. P. 26(f) conference and to file their proposed discovery plan and scheduling order (the “Deadlines”).

Good cause exists to extend the Deadlines. The Parties need additional time for counsel to coordinate to set the discovery conference. Additionally, the Parties are engaged in active settlement discussions that may alleviate the need to submit a proposed discovery plan. Therefore, it is appropriate to extend the deadlines for the

1 Parties to file their proposed discovery plan and scheduling order to allow time for
2 the Parties to meet and confer in compliance with Local Rule 26-1(b).

3 Parties therefore request to extend the Deadlines by 30 days, making the new
4 deadline for the submission of a stipulated discovery plan and scheduling order on
5 January 12, 2023. This is the first request for an extension of this deadline.

6 Dated: December 12, 2022.

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8 **KIND LAW**

9 /s/ Michael Kind
10 Michael Kind, Esq.
11 8860 South Maryland Parkway, Suite 106
12 Las Vegas, Nevada 89123
Counsel for Plaintiff

13 **LEWIS ROCA ROTHGERBER CHRISTIE LLP**

14 /s/ Brittni A. Tanenbaum
15 Brittni A. Tanenbaum, Esq.
16 J. Christopher Jorgensen, Esq.
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18 Las Vegas, Nevada 89169
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20 IT IS SO ORDERED.

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23 U.S. MAGISTRATE JUDGE

24 Dated: December 12, 2022
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